

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

*Caption in Compliance with D.N.J. LBR 9004-2*

**A.Y. STRAUSS LLC**

Eric H. Horn, Esq.

Heike M. Vogel, Esq.

Maria A.G. Harper, Esq.

290 West Mount Pleasant Avenue, Suite 3260

Livingston, New Jersey 07039

Tel. (973) 287-5006

Fax (973) 533-0127

*Counsel to the Debtors  
and Debtors in Possession*

In re:

JTRE 14 VESEY LLC,

Debtor.

Chapter 11

Case No. 24-12087 (MBK)

*(Jointly Administered)*

**STIPULATION BETWEEN JTRE 14 VESEY LLC AND CPIF MRA, LLC  
EXTENDING THE TIME BY WHICH THE DEBTOR HAS TO FILE A PLAN OR  
BEGIN MAKING ADEQUATE ASSURANCE PAYMENTS TO JUNE 10, 2024**

The above-captioned debtor and debtor in possession (the “**Debtor**”) and CPIF MRA, LLC (the “**Lender**”) hereby enter into this stipulation (the “**Stipulation**”) extending the time by which the Debtor has to file a Plan of reorganization or liquidation (a “**Plan**”) or begin making adequate assurance payments pursuant to Bankruptcy Code section 363(d) to June 10, 2024. Each of the Debtor and the Lender are a “**Party**” and are collectively referred to herein as the “**Parties**.**”**

**RECITALS**

**WHEREAS**, on February 28, 2024 (the “*Petition Date*”), the Debtor filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “*Bankruptcy Code*”) in the United States Bankruptcy Court for the District of New Jersey (the “*Court*”);

**WHEREAS**, the Debtor owns, in fee, the real property at located at 14 Vesey Street, New York, NY 10007 (the “*Property*”);

**WHEREAS**, on March 8, 2024, the Lender filed a motion seeking, among other things dismissal of the Debtor’s chapter 11 case;

**WHEREAS**, by Court order dated April 8, 2024 [Docket No. 35], the Court required the Parties to mediate the disputes between the Parties raised in the Lender’s motion to dismiss and as of the date of this Stipulation, such mediation is continuing;

**WHEREAS**, the deadline to file a Plan or begin making adequate protection payments was originally May 28, 2024;

**WHEREAS**, by stipulation entered into between the Parties [*see* Docket No. 67], the deadline to file a Plan or begin making adequate protection payments was extended to June 3, 2024; and

**WHEREAS**, the Parties wish to further extend the deadline to file a Plan to June 10, 2024.

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:**

1. The recitals set forth above are incorporated herein by this reference as though set forth herein at length.
2. The deadline to file a Plan is extended to June 10, 2024.
3. Each person who executes this Stipulation on behalf of a Party represents and warrants that he or she is duly authorized and has requisite authority to execute and deliver this

same on behalf of such Party and to bind his or her respective Party to the terms and conditions of this Stipulation.

**IN WITNESS WHEREOF**, the Parties hereto have caused this Stipulation to be executed as of the day and year written below.

Dated: June 3, 2024

**A.Y. STRAUSS LLC**

/s/ Eric H. Horn

Eric H. Horn, Esq.  
Heike M. Vogel, Esq.  
Maria A.G. Harper, Esq.  
290 West Mount Pleasant Avenue, Suite 3260  
Livingston, New Jersey 07039  
Tel. (973) 287-5006  
Fax (973) 533-0127

*Counsel to the Debtor*

**BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP**

/s/ Kevin M. Capuzzi

Kevin M. Capuzzi, Esq.  
1313 North Market Street, Suite 1201  
Wilmington, DE 19801  
Telephone: (302) 442-7010  
Facsimile: (302) 442-7012

*Counsel to the Lender*